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October 14, 2021

VIA ELECTRONIC CASE FILING

Honorable Anne Y. Shields  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
Central Islip, New York 11722

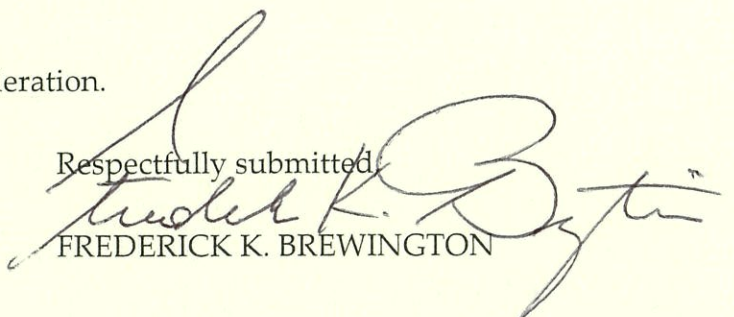
*Re: Sharpe v. County of Nassau, et. al.*  
*Docket No.: CV-15-6446 (GRB)(AYS)*

Dear Judge Shields:

As you are aware, we are the attorneys representing the Plaintiff, Ms. Dolores Sharpe, in the above referenced matter. We write in an abundance of caution and to advise the Court of our serious concern about our ability to meet the deadline set of October 25, 2021, to complete the depositions of Defendants Volpe and Gladitz. We begun trying to secure dates for each of those witnesses in September and recently was able to secure a date for Defendant Volpe for October 25, 2021. However, our efforts to secure a date for Defendant Gladitz has yet to yield a date. We have suggested multiple dates in multiple correspondence all of which have not been acceptable to counsel for Defendant Gladitz. Currently, we are being offered deposition dates which are after October 25, 2021, which would be outside the deadline set by Your Honor. Accordingly, we ask that the Court order that Defendant Gladitz be deposed on a date and time offered by our office or that the deadline for taking his deposition be extended to November 15, 2021 to allow ample time for Defendant Gladitz to agree on a date for his examination.

We thank the Court for its kind consideration.

Respectfully submitted,

  
FREDERICK K. BREWINGTON

cc: Matthew Mehnert, Esq. (via ecf)  
James Murphy, Esq. (via ecf)  
Steven Stern, Esq. (via ecf)

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